

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

D. B.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 4:12-CV-00654-JAR
	)	
ST. CHARLES COUNTY, MISSOURI;	)	
and JASON KING,	)	
Defendants.	)	

**DEFENDANT ST CHARLES COUNTY'S  
MOTION FOR SUMMARY JUDGMENT**

Pursuant to F.R.Civ P. 56(a), Defendant St. Charles County moves this Court for an order entering summary judgment in its favor and dismissing Plaintiff's action against it with prejudice. As grounds for this motion, Defendant County states the following:

1. Based upon the undisputed facts in the record before this Court and the law applicable to those facts, St. Charles County is entitled to summary judgment on Plaintiff's claims against this Defendant.

2. In support of this motion, Defendant St. Charles County relies upon its memorandum in support of this motion, its statement of uncontroverted material facts, and upon the documents submitted in support thereof.

WHEREFORE, Defendant St. Charles County prays this Court enter an order granting summary judgment and dismissing Plaintiff's action against it with prejudice and awarding Defendant County such further relief as this Court deems proper.

Respectfully Submitted,

OFFICE OF THE ST CHARLES  
COUNTY COUNSELOR

By: /s/ Beverly E. Temple

BEVERLY E. TEMPLE, #36095MO

100 North Third Street, Suite 216

St. Charles, MO 63301

636.9649.7540

636.949.7541 (facsimile)

[btemple@sccmo.org](mailto:btemple@sccmo.org)

Attorneys for Defendant St. Charles  
County, Missouri

**CERTIFICATE OF SERVICE**

I hereby certify that on September 6, 2013, a copy of the above and foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to:

Stephen J. Ryals  
Attorney for Plaintiff  
3120 Locust Street  
St. Louis, MO 63103  
Email: [ryals@rblawstl.com](mailto:ryals@rblawstl.com)

Donald Hood  
Attorney for Defendant King  
P. O. Box 220366  
Kirkwood, MO 63122  
[hoodlaw@sbcglobal.net](mailto:hoodlaw@sbcglobal.net)

/s/ Beverly E. Temple